

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division

Pamela Nicole Fairey,

Debtor.

Chapter 13
Case No. 22-13154-pmm

Motion to Modify Plan After Confirmation

Debtor Pamela Nicole Fairey, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on November 28, 2022. The plan was confirmed on October 25, 2023.
2. The Trustee recently filed a motion to dismiss this case for failure to make plan payments.
3. The Debtor wants to amend her plan to resolve the dismissal motion.
4. The proposed plan cures the arrearage that gave rise to the dismissal motion by increasing the Debtor's monthly plan payments moving forward.
5. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 73 as the new confirmed plan.
6. The Debtor will soon file a supplemental Schedule J as evidence of the Debtor's ability to fund the new plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 6, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: 

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